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OCT 19 2006

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Application of	)	
	)	
Applicants: James Benjamin Williams et al.	)	
	)	Examiner
Serial No. 10/797,889	)	Thu Thao Haven
	)	
Filed: March 10, 2004	)	Art Unit 3624
	)	
Title: Methods for issuing, distributing, managing and	)	
redeeming investment instruments providing	)	
securitized annuity options	)	

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

FAX TRANSMISSION COVER LETTER

- 12 SHEETS TOTAL -

The attached RESPONSE (11 pages) is being transmitted via facsimile to the central facsimile number of United States Patent and Trademark Office, (571) 273-8300, on October 19, 2006.

Respectfully submitted,



Dated: October 19, 2006

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Applicants: James Benjamin Williams et al	)	
	)	Examiner
Serial No. 10/797,889	)	Thu Thao Havan
	)	
Filed: March 10, 2004	)	Art Unit 3624
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and redeeming investment instruments	)	
providing securitized annuity options	)	

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

RESPONSE

This response requests reconsideration of the rejection contained in the Office Action mailed on October 6, 2006.

Status of this application

Claims 1-13 and 15-22 are pending.

In the Office Action mailed on October 5, 2006, the Examiner rejected all of the claims under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. U.S. Patent 6,611,815 (hereinafter "Lewis") in view of Haskins U.S. Patent 6,064,969 (hereinafter "Haskins").

Overview of this Response

The outstanding Office Action repeated the comparison of the rejected claims with Lewis that was contained in the prior rejection mailed on June 15, 2006, indicating that applicants' previously submitted remarks in response to that rejection were considered to be moot in view of the new grounds of rejection based on Lewis taken with Haskins. But much of applicant's prior response explained that the Examiner's prior reliance on Lewis as teaching numerous claimed